

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JAMES RUSSELL MILLER

PLAINTIFF

v.

NO. 3:14-cv-00427-HTW-LRA

**MANAGEMENT & TRAINING CORPORATION;
PATRICIA DOTY; PRISCILLA DALY;
and LAWRENCE MACK**

DEFENDANTS

JOINT MOTION FOR CONTINUANCE

COMES NOW, the Parties by and through their respective counsel, and for their Joint Motion for Continuance, state:

1. This matter is currently scheduled for trial on December 7, 2015.
2. The Parties have begun the process of discovery but have not yet completed this process in any meaningful manner.
3. Further, the Parties have recently sought and been granted additional discovery allowances by this Court. Doc. 71 and Accompanying Order.
4. Based upon the pace of discovery thus far, none of the Parties believe they are in a position to maintain the current deadlines for this case.
5. Plaintiff presented counsel for Defendants with notification of intention to file this Joint Motion and with a Good Faith Certificate for signature in accordance with Local Rule 37(a), with representatives of all parties agreeing to have there electronic signatures attached thereto. Ex. 1.

WHEREFORE, all Parties request that this Court grant this Joint Motion for Continuance, that the trial date and all deadlines be thus continued, and that a new

Scheduling Order be issued, and all other proper relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served on this, the 7th day of April, 2015, via ECF and electronic mail upon counsel for the Defendants.

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